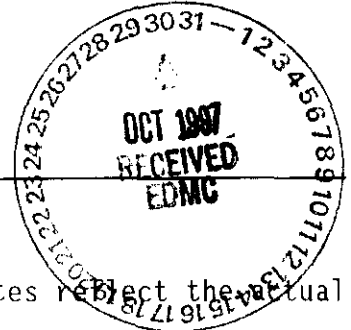


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Meeting Minutes
Interim Status Dangerous Waste Tank Systems
Hanford Federal Facility Agreement and Consent Order
Milestone M-32-00

PROJECT MANAGERS MEETING
December 18, 1996



The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers Meeting (PMM).

W. R. Brown, Representative, Fluor Daniel Hanford, Inc.

Date: 2-19-97

D. E. Jackson, Project Manager, Department of Energy, Richland Operations Office

Date: 9-29-97

per phone call 10/06/97

J. M. Thurman, Representative, Lockheed Martin Hanford Corporation

Date: 2/5/97

R. W. Wilson, Unit Manager, Washington State Department of Ecology

Date: 10/06/97

Purpose: Discuss current Double-Shell Tank Farm issues related to Milestone M-32-00.

Meeting minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Summary of Discussion, Agreements and Actions
- Attachment 2 - Attendance List
- Attachment 3 - Draft M-32-96-02 (Revision V provided by RL)

**MILESTONE M-32-00
PROJECT MANAGERS MEETING
December 18, 1996**

Summary of Discussion, Agreements and Actions

This meeting was held to continue discussions on change control form M-32-96-02, which proposes new Hanford Federal Facility Agreement and Consent Order double-shell tank (DST) system integrity assessment interim milestones and target dates.

Mr. Dale Jackson, of the U.S. Department of Energy, Richland Operations Office (RL), distributed revision V of change control form M-32-96-02. He began by reviewing the minor word changes that were made to the change control form. Once that was completed, Ms. Laura Cusack, of the Washington State Department of Ecology (Ecology), listed the following as major issues concerning Ecology: use of the Federal version of the tank system integrity assessment certification statement versus the State version of that certification statement; the definition of an independent, qualified, registered professional engineer (IQRPE); and the necessity for the IQRPE "supervision" of the assessment activities as mentioned in the certification statement.

Mr. Jackson explained that the certification statement from Title 40 of the Code of Federal Register (CFR) Section 270.11(d) and the statement from the Washington Administrative Code (WAC) Dangerous Waste Chapter, Section 173-303-810(13)(a) were no different. It is through the U.S. Environmental Protection Agency (EPA), Office of Solid Waste and Emergency Response (OWSER) directive that an alternative certification statement is allowed for interim status facilities. (The OWSER directive, which is issued by the EPA, states that "the EPA does not interpret the requirement to certify in accordance with §270.11(d) to require certifying individuals to use the §270.11(d) verbatim" for those cases such as when an IQRPE certifies a tank system assessment that was not prepared under his direction.) Also, Mr. Jackson stated that the WAC 173-303-040 definition of an IQRPE would be used and that Mr. Keith Scott, of the SGN Eurisys Services Corporation (SESC), met the WAC definition of an IQRPE.

Ms. Cusack expressed her concern that Mr. Scott could not be considered "independent" and that Ecology would be criticized if he were to function as the IQRPE. Mr. Jackson responded with the concern that RL will be forced to incur unnecessary extra expense should an additional IQRPE be employed when Mr. Scott meets the definition set forth in Ecology's regulations (WAC 173-303-40).

Ms. Cusack explained that Ecology does not believe Mr. Scott meets its definition of IQRPE, in that while he is no longer directly employed by an owner or operator of the Hanford Facility, he has within the last year been employed by a past operator of the Facility (Westinghouse Hanford Company). RL maintains that such criteria is neither explicitly nor implicitly stated in WAC 173-303-40, or elsewhere in Ecology's regulations, and that this unpublished criteria does not disqualifies Mr. Scott from functioning as the IQRPE with respect to the Hanford Facility. Ecology maintains that Mr. Scott would not be totally independent enough to certify the ultrasonic testing performed for a project when he is the primary developer of that project. Mr. Jackson stated that further discussion will be needed to resolve this issue.

Mr. Scott reminded all that the DST visual examinations and the initial tank ultrasonic tests have already been performed. A new IQRPE could not certify that this work had been performed under his direction or supervision. Ms. Cusack maintained that Mr. Scott was not "independent" as he was more aware of budget and schedule issues than another IQRPE would be. She felt that this familiarity would influence Mr. Scott's certification of the DST assessments. Mr. Jackson pointed out that the liability to Mr. Scott would be the same as it would be to another IQRPE (i.e., improper or unethical conduct could result in the State taking disciplinary action under its registered professional engineer licensing regulations) and that this would insure Mr. Scott's true assessment of the DSTs. He said that RL was comfortable with using the 40 CFR §270.11(d) language with the understanding that Mr. Scott will be the IQRPE in order that certification would truthfully state that the work was performed under the direction and supervision of the certifying individual. Ms. Cusack wanted to be sure that she understood that if the OSWER certification statement was used, that another IQRPE could be used. Mr. Jackson clarified that RL will consider using the OSWER statement and someone other than Mr. Scott as the IQRPE. Mr. Scott mentioned that we would need a certification statement that an IQRPE could sign without having to repeat assessment activities.

Mr. Jackson also pointed out that another issue, yet to be addressed, involved what will happen if all DSTs were not found to be fit. For example, there is a need to fine-tune the proposed interim milestone's language to reflect that only six DST integrity assessments will be completed by the M-32-00 major milestone date of September 1999. If, as a outcome of one of these assessments, more tanks are added to the ultrasonic testing efforts, then the resulting individual tank integrity assessments would be scheduled for a date later than September 1999.

Agreements/Actions:

1. Provide a copy of the OSWER certification statement to Ms. Cusack
(Completed on 12-19-96).

**MILESTONE M-32-00
PROJECT MANAGERS MEETING
December 18, 1996**

Attendees

NAME	ORGANIZATION
Russ Brown	Fluor Daniel Hanford, Inc. - TPA Integration
Laura Cusack	Ecology
Geneva Ellis-Balone	DOE\RL-EAP
Dale Jackson	DOE\RL-EAP
Keith Scott	SGN Eurisys Services Corporation
Ana Sherwood	Rust Federal Services of Hanford Inc.
Jack Thurman	Lockheed Martin Hanford Corporation
Bob Wilson	Ecology

M-32-00 PROJECT MANAGERS MEETING

December 18, 1996

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Attachment 3

**MILESTONE M-32-00
PROJECT MANAGERS MEETING
December 18, 1996**

Draft M-32-96-02
(Revision V provided by RL)

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Change Number M-32-96-02	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 12-18-96
Originator _____ Phone _____		
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Addition of M-32 Milestones for the Double-Shell Tank System.		
Description/Justification of Change As a condition precedent to obtaining a final status dangerous waste facility permit, WAC 173-303-640(2) requires that integrity assessments be conducted on existing dangerous waste underground storage tanks. Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) interim milestone M-32-04 was originally drafted to establish a path for achieving compliance with the regulation cited above. Major Milestone M-32-00 states that "completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future." The <i>Tank Waste Remediation Systems Transfer Facility Compliance Plan</i> (WHC-SD-WM-EV-094, Rev. 0) submitted in fulfillment of M-32-04-T04 identified portions of the (Continued on the following page)		
Impact of Change Deficiencies identified during tank system integrity assessment activities may result in the need to establish additional milestones or target dates under the Tri-Party Agreement, in which event a new major milestone completion date for M-32-00 may need to be established.		
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Table D.		
Approvals <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">DOE</div> <div style="width: 30%;">Date</div> <div style="width: 30%;"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 30%;">EPA</div> <div style="width: 30%;">Date</div> <div style="width: 30%;"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 30%;">Ecology</div> <div style="width: 30%;">Date</div> <div style="width: 30%;"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div>		

Description/Justification of Change (cont'd)

Double-Shell Tank (DST) Transfer System that are not in full compliance with interim status dangerous waste tank system management regulations, and require corrective actions and/or development of compliance strategies. This report will be updated as indicated by target date M-32-10-T02 in this change control form. The *Tank Waste Remediation System Tank System Integrity Assessments Program Plan* (WHC-SD-WM-AP-017, Rev. 1) submitted in fulfillment of M-32-04-T05 identified a path forward to complete integrity assessments of the DST system including double-contained receiver tanks (DCRTs), the 241-A-350 Drainage Lift Station, the 204-AR Waste Unloading Facility, and various transfer lines, diversion boxes, valve pits, pump pits, seal pots, and cleanout boxes.

The DST system final status dangerous waste facility permit is scheduled for issuance in September 1999, by modification of the Hanford Facility RCRA Permit, Dangerous Waste Portion. The interim milestones and target dates contained in this change control form support the issuance of the final status dangerous waste facility permit by providing a compliance strategy for the completion of the DST system integrity assessments prior to issuance of that permit.

When integrity assessments are completed, an integrity assessment report will identify deficiencies related to structural integrity found during the assessments. The transfer facility compliance plan will address deficiencies not related to structural integrity (e.g., adequacy of leak detection). Correction of identified deficiencies will be addressed by either: 1) RL completing action that corrects the deficiency by no later than July 1999; or 2) including a permit condition in the final status dangerous waste facility permit; or 3) establishment of additional milestones or target dates under the Tri-Party Agreement.

This change control form adds two new interim milestones, M-32-09 and M-32-10. Interim milestone M-32-09 addresses the DST integrity assessments, while M-32-10 addresses the transfer system (including pipe lines, diversion boxes, valve pits, pump pits and cleanout boxes), catch tanks, DCRTs, and ancillary equipment (i.e., 241-A-350 Drainage Lift Station, 204-AR Waste Unloading Facility, and seal pots). Interim milestone M-32-09 specifies that six DSTs will be chosen for ultrasonic examination. These six will be selected based on tank selection criteria identified in the *Description of Double-Shell Tank Selection Criteria for Inspection* (WHC-SD-WM-ER-529, Rev. 0) document. The goal of these examinations is to verify that the DSTs have adequate integrity to be properly operated in accordance with applicable regulations. The content of this change control form will require RL to perform an approved scope of work sufficient to make a determination of the integrity of the DST system. The scope of work must be approved by an independent, qualified, registered professional engineer (IQRPE) as defined by WAC 173-303-040.

Interim milestone M-32-09 reflects an agreement between Ecology and RL, that it may be possible to confirm the integrity of all twenty-eight DSTs by performing the assessment activities identified in the milestones and target dates contained in this change control form. Results from the ultrasonic testing of the six DSTs selected under M-32-09, will be evaluated to determine the need, if any, for ultrasonic testing of additional DSTs prior to Ecology issuing a final status dangerous waste facility permit. The results of the DST ultrasonic testing will be evaluated by a panel of technical experts composed of members of the Tank Structural Integrity Panel, or a similar group as agreed to by RL and Ecology. The result of the panel's evaluation will be considered, along with other relevant information, in determining the need, if any, for future ultrasonic testing beyond six DSTs.

Recurring testing as required by WAC 173-303-640(2)(e) will be specified as a permit condition in the final status dangerous waste facility permit. The final integrity assessment reports must include a proposed schedule for repeating integrity assessments over the life of the tank system. The schedule must be based on the results of the integrity assessments, age of the tank system, materials of construction, characteristics of the waste and any other relevant factors. RL will consider this schedule when developing its final status dangerous waste permit application.

Add the following interim milestones:

M-32-09	Complete integrity assessments for Double-Shell Tanks (DSTs).	September 1998
	These integrity assessments will consist of a combination of visual inspections and design reviews on all 28 DSTs, and ultrasonic testing on six DSTs (including their secondary containment). The Integrity Assessment Report will be certified by an IQRPE in accordance with 40 CFR, 270.11(d).	
M-32-09-T01	Prepare a report, approved and signed by an IQRPE, that specifies the scope of work that will be performed to assess the integrity of the DSTs.	April 1997
M-32-09-T02	Perform ultrasonic testing, as described in the report required by M-32-09-T01, of two tank walls and one tank bottom.	September 1997
M-32-09-T03	Perform ultrasonic testing, as described in the report required by M-32-09-T01, of four tank walls and five tank bottoms.	September 1998

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Change Number M-32-96-02, Rev. V

Page 4 of 6

M-32-09-T04	Complete and submit to Ecology an integrity assessment report for the DSTs, signed and certified by an IQRPE. Correction of identified deficiencies will be addressed by either: 1) RL completing action that corrects the deficiency by no later than July 1999; or 2) including a permit condition in the final status dangerous waste facility permit; or 3) establishment of additional milestones or target dates under the Tri-Party Agreement.	September 1998
M-32-10	Complete integrity assessments for specified Double-Shell Tank (DST) waste transfer system.	September 1999
M-32-10-T01	Complete and submit to Ecology a certified integrity assessment report for DST transfer lines (including diversion boxes, valve pits, pump pits and cleanout boxes). This assessment will be based on a representative evaluation. Correction of identified deficiencies will be addressed by either: 1) RL completing action that corrects the deficiency by no later than July; or 2) including a permit condition in the final status dangerous waste facility permit; or 3) establishment of additional milestones or target dates under the Tri-Party Agreement. The Integrity Assessment Report will be certified by an IQRPE in accordance with 40 CFR, 270.11(d).	February 1997
M-32-10-T02	Prepare the Transfer Facility Compliance Plan (Rev. 1) addressing all known non-compliant tank system conditions necessary for compliance with WAC 173-303-640 within the DST waste transfer system. Correction of identified deficiencies will be addressed by either: 1) RL completing action that corrects the deficiency by no later than July 1999; or 2) including a permit condition in the final status dangerous waste facility permit; or 3) establishment of additional milestones or target dates under the Tri-Party Agreement.	March 1997

M-32-10-T03	<p>Complete and submit to Ecology a certified integrity assessment report for nine catch tanks. These catch tanks are 241-A-302A, 241-ER-311, 241-EW-151, 241-TX-302C, 241-U-301B, 241-UX-302A, 241-AZ-151, 241-AX-152, and S304. Provide a schedule to address any deficiencies described in the report related to catch tank compliance. Correction of identified deficiencies will be addressed by either: 1) RL completing action that corrects the deficiency by no later than July 1999; or 2) including a permit condition in the final status dangerous waste facility permit; or 3) establishment of additional milestones or target dates under the Tri-Party Agreement.</p> <p>The Integrity Assessment Report will be certified by an IQRPE in accordance with 40 CFR, 270.11(d).</p>	July 1999
M-32-10-T04	<p>Complete and submit to Ecology a certified integrity assessment report for five double-contained receiver tanks (DCRTs). These DCRTs are 244-TX, 244-BX, 244-U, 244-S, and 244-A. Provide a schedule to address any deficiencies described in the report related to DCRT compliance. Correction of identified deficiencies will be addressed by either: 1) RL completing action that corrects the deficiency by no later than July 1999; or 2) including a permit condition in the final status dangerous waste facility permit; or 3) establishment of additional milestones or target dates under the Tri-Party Agreement.</p> <p>The Integrity Assessment Reports will be certified by an IQRPE in accordance with 40 CFR, 270.11(d).</p>	July 1999

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Change Number M-32-96-02, Rev. V

Page 6 of 6

M-32-10-T05

Complete and submit to Ecology a certified integrity assessment report for DST ancillary equipment. This ancillary equipment is comprised of the 241-A-350 Drainage Lift Station, the 204-AR Waste Unloading Facility, and 16 seal pots (for which a representative evaluation will be performed). Provide a schedule to address any deficiencies described in the report related to tank ancillary equipment compliance. Correction of identified deficiencies will be addressed by either: 1) RL completing action that corrects the deficiency by no later than July 1999; or 2) including a permit condition in the final status dangerous waste facility permit; or 3) establishment of additional milestones or target dates under the Tri-Party Agreement.

July 1999

The Integrity Assessment Reports will be certified by an IQRPE in accordance with 40 CFR, 270.11(d).

**Meeting Minutes
Interim Status Dangerous Waste Tank Systems
Hanford Federal Facility Agreement and Consent Order
Milestone M-32-00**

**PROJECT MANAGERS MEETING
December 18, 1996**

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Administrative Record: TPA Milestone M-32-00:
T-2-5, TS-2-1, T-2-7, TS-2-3, S-2-3
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Please send comments on distribution to A. R. Sherwood, H6-26, 376-6391.